



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: December 17, 1986

SUBJECT: DEIS for Jefferson/Conner Industrial Revitalization Project

Bonnie L. Eleder *BLE*
FROM: Remedial Project Manager

Tom Nowicki
TO: Environmental Review Branch

The following are my comments and recommendations on the first revision of the DEIS named above dated December 15, 1986.

1. Page 14 - Records Search: A records search should also be made for CERCLA notification of the Study area.
2. Page 17 - Geophysical Investigation Methods: (1) One method should be employed for drilling all the bore holes in order to maintain consistency of results (to maintain your quality control). (2) Why is the 2nd 12 inches of soil/material not to be sampled? It is recommended it be included in order to obtain a complete picture of subsurface conditions. (3) Which wells are temporary wells? Will they be constructed differently from permanent wells? Once again, for all groundwater monitoring wells, the method of construction should be the same in order to maintain your quality control.
3. Page 17 - Characterization of Waste : (1) For hazardous wastes, the procedures outlined in 40 CFR 261, the determination of a hazardous waste, must be followed. An initial analysis "for only those materials for which there is reason to suspect a presence" may not comply with the regulations. (2) How long will the sample splits be retained? Lab protocols specify time periods for storage of samples by the parameters they are to be analyzed for. (3) "If groundwater is not available...a mid-level (soil) sample will be analyzed". What is the rationale here? Comment #2 has recommended that the mid-level depth (second 12 inches) be sampled at the same time as the top (first 12 inches) & bottom (third 12 inches). (4) What procedures, equipment will be used for the collection of groundwater samples?
4. Page 20 - Storm Sewer Sampling: A more definitive rationale for selecting parameters for sample analysis should be developed. Selecting parameters based on those contaminants found in the greatest concentrations may overlook contaminants while in lesser concentrations, are more toxic.
5. Page 20-21 - Sections 3 and 4: These two sections should be switched. The Remediation Plan would be better organized if the remedial actions plans were prepared based on those actions selected.

6. Page 22: It is recommended that Quality Assurance/Quality Control, and Safety, be addressed as part of the DEIS. QA/QC protocols are an integral part of sample collection, handling, and analysis protocols.

bcc: N. Niedergang, CES
B. Franz, ERB

DATE: December 17, 1986

TO: Tom ^{Nowicki} ~~Nowicki~~, Env. Review Branch

FROM: Bonnie L. Elean, CES

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Also -

bee:

N. Niedergang